

Exhibit C – Proposed Order

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re

EAST BROADWAY MALL,

Debtor.

Chapter 11

Case No. 19-12280-DSJ

**ORDER UNDER 11 U.S.C. §§ 501 AND 502 AND BANKRUPTCY RULE 3007
GRANTING BANK OF HOPE'S OBJECTIONS TO : CLAIM 1-6 – DEPARTMENT OF
THE TREASURY; CLAIM 4-1 – NEW YORK STATE DEPARTMENT OF TAXATION
& FINANCE; CLAIM 9-1 – TERRY CHAN; CLAIM 10-1 – HERSHEY CHAN REALTY,
INC.; AND CLAIM 11-1 – NYC DEPARTMENT OF FINANCE**

Bank of Hope, f/k/a BBCN Bank ("**Bank of Hope**"), a creditor of the above-captioned debtor, East Broadway Mall (the "**Debtor**"), having filed the objections to claims (the "**Objection**"), and request for an order pursuant to 11 U.S.C. §§ 501, 502, and 507(a)(4) and Federal Rule of Bankruptcy Procedure 3007 to disallow, expunge and/or reclassify the Claims listed on Exhibit A to the Objection; and the Court having held a Hearing on October 17, 2023 to consider the Objection; and upon the Objection and the record of the Hearing and of this case; and good cause appearing therefor, it is hereby

ORDERED, that:

1. Bank of Hope's Objection to Claim 1-6 of the Department of the Treasury is granted, and Claim 1 is hereby disallowed and expunged pursuant to Bankruptcy Rule 3007(d)(6).
2. Bank of Hope's Objection to Claim 4-1 of the New York State Department of Taxation & Finance is granted, and Claim 4-1 is hereby disallowed and expunged pursuant to Bankruptcy Rule 3007(d)(3).
3. Bank of Hope's Objection to Claim 9-1 of Terry Chan is granted, and Claim 9-1 is hereby disallowed and expunged pursuant to Bankruptcy Rule 3007(d)(6).

4. Bank of Hope's Objection to Claim 10-1 of Hershey Chan Realty, Inc. is granted, and Claim 10-1 is hereby disallowed and expunged pursuant to Bankruptcy Rule 3007(d)(6).

5. Bank of Hope's Objection to Claim 11-1 of NYC Department of Finance is granted, and Claim 11-1 is hereby disallowed and expunged pursuant to Bankruptcy Rule 3007(d)(6).

6. This Order is made and entered without prejudice to the rights of Bank of Hope to object further to any claim to the extent additional bases for objections become known.

7. Bank of Hope is directed to cause service of this Order to be given to each claimant whose claim is affected by this Order, at the address given by such claimant on its claim.

Dated: New York, New York
October , 2023

United States Bankruptcy Judge